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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

In re MGM MIRAGE SECURITIES
LITIGATION

This Document Relates To:

ALL ACTIONS.

) No. 2:09-cv-01558-GMN-VCF

)

) CLASS ACTION

)

) LEAD PLAINTIFFS' NOTICE OF MOTION
) AND MOTION FOR (1) FINAL APPROVAL
) OF CLASS ACTION SETTLEMENT; (2)
) APPROVAL OF PLAN OF ALLOCATION
) OF SETTLEMENT PROCEEDS; AND (3)
) AN AWARD OF ATTORNEYS' FEES AND
EXPENSES TO LEAD COUNSEL AND
AWARDS TO LEAD PLAINTIFFS
PURSUANT TO 15 U.S.C. §78u-4(a)(4)

DATE: December 15, 2015

TIME: 9:00 a.m.

CTRM: The Honorable Gloria M. Navarro

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that pursuant to this Court's Order dated September 11, 2015, on December 15, 2015, at 9:00 a.m., in the Courtroom of the Honorable Gloria M. Navarro, United States District Judge, District of Nevada, at the Lloyd D. George U.S. Courthouse, 333 Las Vegas Boulevard South, Las Vegas, Nevada 89101, Lead Plaintiffs Arkansas Teacher Retirement System, Philadelphia Board of Pensions and Retirement, Luzerne County Retirement System, and Stichting Pensioenfond Metaal en Techniek (collectively, "Lead Plaintiffs") will and hereby respectfully move the Court to enter a judgment and orders (1) granting final approval of the proposed settlement of this litigation; (2) approving the proposed plan for allocating the net settlement proceeds; and (3) awarding Lead Counsel attorneys' fees and expenses and Lead Plaintiffs' expenses. In support of this motion, Lead Plaintiffs submit this notice, the memoranda of points and authorities in support thereof, the declarations filed in support thereof, the pleadings and files herein and such other written or oral argument as may be presented to the Court.

A proposed judgment and orders will be submitted with Lead Plaintiffs' reply submission after the deadline for objecting and requesting exclusion from the Class have passed.

DATED: November 3, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 3, 2015.

s/ Brian O. O'Mara

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